

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 1:22-CV-22671**

DELIO BATISTA,
CARLOS LOPEZ,
MARIANA LOPEZ, and
RAFAELA VALIENTE

,
Plaintiffs,

vs.

AVANT ASSURANCE INC.,
REINIER CORTES, AND
ANDREA GONZALEZ QUINTERO,

Defendants.

_____ /

DEFENDANTS' REQUEST FOR PRODUCTION

Defendants, AVANT ASSURANCE INC., ET AL (hereinafter "Defendants"), by and through undersigned counsel and pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby request Plaintiffs to produce within 30 days the documents identified below at the office of the undersigned counsel.

1. All written agreements entered into by the Defendant and the Plaintiff.
2. All written communications, applications, correspondence or records thereof relating to

or pertaining to the subject matter of the instant action.
3. All written communications, letters, or records thereof between the Defendant and the Plaintiff.
4. All accounts, ledgers, records or other documents including payment receipts, notes, and

memoranda related to the Joint Venture agreements.

5. Any and all documents, statements, reports, notes, or any other documents that Defendant intends to offer at trial in this action.
6. All documents contained in any file maintained by the Plaintiffs regarding the Defendant that are relevant to the allegations that form the basis of the Plaintiff's Complaint in this action.
7. Any and All documents generated by Plaintiff's, and/or Plaintiff's accounts, concerning Federal Tax filings, 1099 Forms, Federal Tax Returns for the last three (3) years.
8. Any and All documents and/or Invoices presented by the Plaintiff's to the Defendant showing monies owed to the Plaintiff's.
9. All telephone log sheets, emails, computer printouts and any other internal memoranda or notes concerning the Independent Contractors Agreement executed between the parties.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this _ day of February, 2023, a true and correct copy of the foregoing has been furnished by electronic mail to all counsel of record.

CUETO LAW GROUP P.L.
Attorneys for Defendants AVANT ASSURANCE
INC., REINIER CORTES, and ANDREA
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By: /s/ Santiago Cueto
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